

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.: 4:23-cr-00578-AGF-NCC
	)	
CONNIE BOBO,	)	
	)	
Defendant.	)	

**MOTION TO MODIFY CONDITIONS OF RELEASE**

COMES NOW Defendant, Connie Bobo, by and through counsel, and moves this Court pursuant to 18 U.S.C. 3145 § (a)(2) to modify conditions 7(w) and 7(z) of the conditions of release imposed. In support of this motion, Defendant states as follows:

1. Defendant is charged with Wire Fraud, Aggravated Identify Theft and Obstruction of an Official Proceeding.
2. On October 30, 2023, this Court admitted Defendant to bail on a combination of conditions of release, determining that the conditions imposed would reasonably assure both her appearance at trial and the safety of the community.
3. Conditions 7(w) and 7(z) are among the conditions imposed by this Court and both relate to restrictions on employment.
4. Defendant currently owns and operates a childcare service called Great Beginnings. Conditions 7(w) and 7(z) as currently written would make it difficult for Defendant to continue operating this business and for Pretrial Services to effectively supervise her.

5. Counsel met with the Assistant United States Attorney, Derek Wiseman and Pretrial Services officer, Katie Stephens regarding this matter. The parties jointly agreed to request conditions 7(w) and 7(z) be replaced with the following language:

- The Defendant is permitted to continue operating Great Beginnings daycare as long as she does not have access to any third-party personal identifying or financial information (including children's information, prospective or current client's information, and employee's information). The defendant's access and responsibilities regarding third-party personal identifying and financial information will be completely removed and delegated to other employees, and the defendant is required to notify her employees of the nature of the pending criminal case and the restrictions the Court has imposed pertaining to her employment as directed by the Pretrial Services Office.
- The defendant will notify all clients of the nature of this pending criminal case by posting a notice in the Great Beginnings' client-facing mobile device application, on the business' website, and on the front door of the business location or as otherwise directed by Pretrial Services.

6. Defendant, through counsel, has discussed this matter with Assistant United States Attorney Derek Wiseman. Mr. Wiseman has no objection to Defendant's request.

WHEREFORE, Defendant respectfully requests this Court modify the conditions of release imposed on October 30, 2023.

Respectfully submitted,

By: /s/ Marc Johnson

Marc Johnson, #580655 MO  
Attorney for Defendant  
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**CERTIFICATE OF SERVICE**

I hereby certify that on November 13, 2023, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Mr. Derek Wiseman, Assistant United States Attorney.